

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: AMERICAN MEDICAL	)	No.: 19-md-2904 (MCA)(MAH)
COLLECTION AGENCY, INC.,	)	
CUSTOMER DATA SECURITY	)	(MDL 2904)
BREACH LITIGATION	)	<b>JOINT STIPULATION AND</b>
	)	<b>ORDER</b>
<i>This Document Relates To:</i>	)	<b>PARTIALLY EXTENDING</b>
<i>All Tracks</i>	)	<b>CERTAIN DISCOVERY</b>
	)	<b>DEADLINES</b>
	)	
	)	

WHEREAS on December 6, 2022, the Court entered a Consolidated Scheduling Order (ECF No. 430);

WHEREAS the Consolidated Scheduling Order established a deadline of December 23, 2022, to bring discovery disputes pertaining to written discovery to the Court's attention in the Quest Track, which was subsequently extended to February 15, 2022 (ECF No. 447);

WHEREAS the Parties to this Stipulation agree that additional time is needed to meet and confer on certain discovery disputes in the Quest Track prior to raising them with the Court;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED as follows:

1. The Parties to this Stipulation shall raise discovery disputes from party written discovery on the Quest Track to the Court's attention on or before February 23, 2023.
2. The call scheduled for February 21, 2023 shall take place as scheduled.

Respectfully submitted this 15th day of February, 2023.

DATED: February 15, 2023

Respectfully submitted,

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*Attorneys for CareCentrix, Inc.*  
By: /s/ William Brown

SO ORDERED this 16th day of February, 2023.

s/ Michael A. Hammer  
**The Hon. Michael A. Hammer**  
*United States Magistrate Judge*